

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

v.

JEFFREY DANIELS
KENNETH KILSON

Defendants.

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Criminal Action No. 08-143 M

MOTION FOR DETENTION HEARING

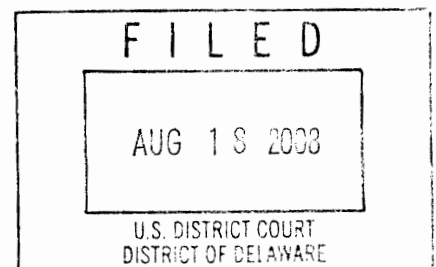
NOW COMES the United States and moves for the pretrial detention of the defendants, pursuant to 18 U.S.C. § 3142(e) and (f). In support of the motion, the United States alleges the following:

1. **Eligibility of Case.** This case is eligible for a detention order because case involves (**check all that apply**):

- ☐ Crime of violence (18 U.S.C. § 3156)
- ☐ Maximum sentence life imprisonment or death
- ☒ 10+ year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☐ Minor victim; possession or use of firearm, destructive device or other dangerous weapon; or failure to register under 18 U.S.C. § 2250
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice

2. **Reason For Detention.** The court should detain the defendant(s) because there are no conditions of release which will reasonably assure (**check one or both**):

- ☒ Defendant's appearance as required
- ☒ Safety of any other person and the community



BY: *AHS*
Dana H. Eisenstein
Assistant United States Attorney